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Additional comments:

Question 1: Are there areas of Ofcom's overall strategic approaches and purposes, outlined in last years' annual plan that may need to change?:

Question 2: What are the issues and areas that should form Ofcom's priorities or major work areas in 2014/15?:

At a time of significant change in the publishing activities of public services broadcasters in the UK there is a need ensure appropriate regulation from Ofcom in order to ensure that when a public service broadcaster carries out commercial activities, these commercial activities are financed commercially and follow normal market behaviour in line with the overarching EU Commission principle applicable to Public Service broadcasters.

Under the EU rules applicable to public sector broadcasters the Commission demands that the positive effects of state aid must be weighed against the risk of crowding out private initiatives and distorting competition. To minimise the impact on competition the commission requires that Member States adhere to guidelines. One of these guidelines is outlined in paragraph 93 "When carrying out commercial activities, public service broadcasters shall be bound to respect market principles and, when they act through commercial subsidiaries, they shall keep arm's length relationships with these subsidiaries. Member States shall ensure that public service broadcasters respect the arm's length principle, undertake their commercial investments in line with market economy investor principle, and do not engage in anti-competitive practises with regard to their competitors, based on their public funding. "

There is one Channel 3 licence holder carrying out commercial activities which do not follow normal market behaviour yet fail to be regulated by Ofcom. Failure to regulate this Channel 3 licence holder's anti-competitive activity sets a precedent for other Channel 3 licence holders undermining the EU Commissions overarching principle for Public Service broadcasting and reducing Ofcom's credibility as an effective regulator. This oversight needs to be addressed in Ofcom's Annual Plan in order to ensure EU guidelines are being delivered. Ensuring no

Channel 3 licence holder is engaging in anti-competitive practices must be one of Ofcom's priorities in 2014/15

Question 3: Are there any specific areas for deregulation or simplification in the coming year?: